

1 when I saw the organization's motion to initiate an investigation
2 that Ms. Dukoff might herself be involved in a Scientology
3 operation. I was, therefore, very alert and very careful when
4 she announced herself on the telephone around the beginning of
5 June.

6 3. Ms. Dukoff's call came in on an afternoon when the
7 office was normally closed, because there were only two people
8 there, myself and attorney Robert Joyce. Michael Flynn had left
9 for home only moments before, and following my conversation with
10 Ms. Dukoff I reached him on his car phone and related the details.
11 The phone rang, I answered, and a woman asked for Mr. Flynn. I
12 said he was not in and asked if I could take a message. She gave
13 her name and I gave mine. She immediately announced that she had
14 sealed documents from my case and she was going to take them to
15 the press to get Mike Flynn. As soon as she made the threat,
16 I put her on hold, asked Mr. Joyce to come into my office to hear
17 the call, then switched her onto the speaker phone when I took her
18 off hold. Mr. Joyce was therefore present and heard all of what
19 Ms. Dukoff and I said, except for the first sentence noted above,
20 a threat she repeated a number of times throughout our
21 conversation.

22 4. Ms. Dukoff states that she "described some of these
23 documents" to me, documents she earlier states at paragraph 18
24 Mr. Flynn said were under seal and for which he or she "could go
25 to jail." In our conversation, she referred to the documents she
26 claimed to possess as "Armstrong documents" or "sealed documents."
27 She did describe, at my request, two or three of these documents,
28 but very sketchily and, even after some questioning by me, she

1 could not describe any of her documents with enough specificity
2 for me to identify them or any as "Armstrong documents"; i.e.
3 any of those documents I obtained from Omar Garrison and sent to
4 my attorneys in 1982, and subsequently delivered to the Clerk
5 of the Los Angeles Superior Court pursuant to the Temporary
6 Restraining Order issued August 24, 1982. The only document Ms.
7 Dukoff was able to describe at all intelligently was a "will", the
8 original of which she said she copied, but she did not know its
9 date or content. I even told Ms. Dukoff that there was no way
10 from what she was telling me that I could know that she even had
11 sealed documents.

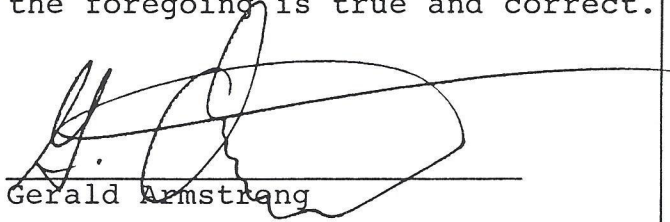
12 5. Ms. Dukoff's statement that I told her "that exposure
13 of the dissemination of these documents would destroy (my) court
14 case against the Church of Scientology" is incorrect. The only
15 thing I said to her repeated threats to go to the press with
16 "sealed documents" or cause Mr. Flynn or me trouble, was "you've
17 got to do what you've got to do." I never considered, nor do I
18 consider, that Ms. Dukoff's going to the press, or Scientology,
19 or anyone else with sealed documents, or forged documents, or
20 any other kind of documents, would destroy my court case. I
21 would not state such a thing, not only because I was aware from
22 the outset that the whole Dukoff document affair was likely a
23 Scientology operation, but because in truth I do not feel that
24 way. It was Ms. Dukoff who said that her going to the press with
25 sealed documents would hurt me.

26 6. Ms. Dukoff's statement that I "obviously recognized
27 these documents as (I) became very upset" is a false conclusion
28 based on falsehoods. I did not recognize any of the Dukoff

1 documents and did not become upset. I remained calm, did not
2 raise my voice, and said nothing which could be interpreted by
3 any rational person as becoming "very upset." I was, however,
4 saddened by Ms. Dukoff's call, by her attack on Mr. Flynn, who
5 she said had "fucked" her and whom she was now "going to fuck,"
6 and by the fact the call evidenced another Scientology operation.
7 Following the call I was acutely depressed. Virtually all of
8 Ms. Dukoff's recitation of our conversation is false.

9 Executed this 2nd day of August, 1986 at Boston,
10 Massachusetts.

11 I declare under the penalty of perjury under the laws
12 of the State of California that the foregoing is true and correct.

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16 Gerald Armstrong
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